



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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Ms. Susan Orenga  
Executive Director  
Portable Generator Manufacturers' Association  
1300 Sumner Avenue  
Cleveland, OH 44115-2851

Dear Ms. Orenga:

Consumer Product Safety Commission ("CPSC") staff<sup>1</sup> was pleased to participate in the March 17, 2016, technical summit held by the Portable Generator Manufacturers' Association ("PGMA").<sup>2</sup> It was a pleasure meeting with representatives from member companies of the PGMA and other concerned stakeholders to discuss the technologies and associated challenges in addressing carbon monoxide ("CO") hazards related to portable generators. Staff found the technical meeting valuable and is pleased that your letter of April 20, 2016<sup>3</sup> states that PGMA intends to create a performance standard to address the CO hazard associated with the use of generators in or near occupied spaces. CPSC staff is committed to working through every avenue available to address the CO poisoning deaths and injuries that result from consumer exposure to emissions from portable generators. CPSC staff urges PGMA to promptly develop performance requirements that will effectively address the CO hazard from portable generators and propose the performance requirements without delay to the canvass group for addition to the ANSI/PGMA G300-2015 *Safety and Performance of Portable Generators*<sup>4</sup> ("G300") standard.

CPSC staff is interested in PGMA's planned research aimed at evaluating and modernizing the mandatory warning label. Moreover, we are open to assessing changes to CPSC's label, and possibly to recommending to the Commission labeling revisions that would further reduce the risk of carbon monoxide poisonings from portable generators. Staff also supports information and education efforts, like those suggested by PGMA, to inform consumers of the CO poisoning hazards presented by portable generators. Likewise, staff supports advocating for increased use of CO

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<sup>1</sup> The comments in this letter are those of CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

<sup>2</sup> <http://www.cpsc.gov/Global/Newsroom/FOIA/Meeting%20Logs/2016/MeetingLogPGMA31716.pdf>

<sup>3</sup> <http://www.cpsc.gov/Global/Regulations-Laws-and-Standards/Voluntary-Standards/Voluntary-Standards-Reports/PGMALettertoRechtCPSCCooperationFinal.pdf>.

<sup>4</sup> [http://www.pgmaonline.com/pdf/ANSI\\_PGMA\\_G300\\_2015.pdf](http://www.pgmaonline.com/pdf/ANSI_PGMA_G300_2015.pdf).

alarms in homes, including through local building codes. Staff believes strongly that warnings and safety measures such as these play an important role, but a secondary role in addressing the hazard at its source, which in this case, is the emission of hazardous levels of CO into occupied spaces.

There appeared to be broad agreement that the March 17, 2016 public technical summit, which involved technical discussions among engineers from CPSC staff and generator, engine and component manufacturers, with input from other important stakeholders, was productive. Therefore, staff strongly encourages you to continue to include all interested stakeholders in public technical meetings as part of your voluntary standards revision process. Staff believes that this would facilitate constructive discussions on the technical issues associated with portable generators.

CPSC staff also would appreciate clarifications and further information as follow-up to the technical summit and your meeting with staff and the Chairman at CPSC on December 10, 2015. PGMA presented a graph indicating relationships between CO deaths and incidents from portable generators per million “portable generator opportunities,” versus year, and presented another graph indicating total fatalities per million portable generators in use for each of three different 4-year periods. Staff would like to know how PGMA defines a “portable generator opportunity,” how you arrived at the number of those opportunities, and your estimates of the number of portable generators in use by year for 2002 through 2013. Staff also requests the aggregate annual sales and expected product life that led to those estimates. Sufficient detail and data, including a detailed description of the methodology used for collection of the data, will help staff replicate the results. Additionally, staff would like to know how many manufacturers certify their products to G300.

Although CPSC staff continues to develop a draft notice of proposed rulemaking for a potential mandatory performance standard, as directed by the Commission, which follows the advance notice of proposed rulemaking that the Commission issued in 2006,<sup>5</sup> staff also remains committed to actively engaging to develop an effective voluntary standard that will reduce CO poisoning deaths and injuries associated with portable generators, working with Underwriters Laboratories (“UL”), PGMA, and any other standards development organizations.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Joel Recht

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<sup>5</sup> *Portable Generators; Advance Notice of Proposed Rulemaking; Request for Comments and Information*, Federal Register, 71 FR 74472, December 12, 2006.